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22 February 1993

Office of the Secretary Federal Communications Commission 20554 Washington, District of Columbia

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The Commissioners of the FCC ATTENTION:

IN THE MATTER OF: PR Docket #92-235 Notice Of Proposed Rule Making

Dear Sirs:

The Council provides volunteer Colorado REACT communications services to the citizens of Colorado and to disaster and search and rescue agencies in our state. We are a small organization, with 42 members in 4 Teams. However, our level of service is extensive - as an example High Country REACT, a Team in Colorado Springs, provided 24,000 hours of volunteer communications service in 1992, handling 350 emergency incidents and 26 disaster, severe weather, and search and rescue callouts. At the level of the individual volunteer, several of our members in Longmont routinely monitor emergency frequencies as many as 200 hours a month to answer calls for help.

REACT has long used the Citizens Band Service. However, today we use the Business Radio Service and the Special Emergency Radio Service for internal communications and liaison with other The proposed rule would make our radios technically obsolete, forcing our volunteers to invest thousands of dollars in new radios, new license fees, and new frequency coordination fees. Our members purchase their radios with their own money - we receive no governmental funding. In an era when budget cuts and tax limitation force governments to increasingly depend on volunteers, this proposal would cripple our ability to work with our local emergency management and search and rescue governmental agencies.

Not as obvious, but as important, are effects on existing scanners. In disasters we rely on scanners to maintain situation awareness of response actions by those agencies we can't directly talk to. In Colorado Springs one of our Teams provides rapid alerting of the Pikes Chapter of the Red Cross to local fires that may require sheltering of burned out families. Without scanners we couldn't do that mission, and the Red Cross would not be as efficient in fulfilling their mandate for disaster response. technical standards will force us to again purchase more equipment.

The combined effects of the proposed rule would force our members to abandon our role as community emergency communicators. None of



our Teams can afford to replace existing radios and scanners in the near future. As emergency communicators, we cannot wait until the end of a grandfathering period - as soon as any agency we work with obtained new equipment, we would have to also. As a Council we would have to cut valuable programs that directly contribute to highway safety and air crash detection and response to fund new license and frequency coordination fees. We believe this proposed rule, while perhaps technically elegant, is poor public policy that will hurt both volunteer agencies and the citizens they serve. We respectfully petition that the Commission reject it.

Sincerely,

Walter G. Green III

President, Colorado Council Of REACT Teams

WGG: mp

cy to: Senators and Representatives, Colorado Congressional Delegation

Mr. Norman Kaplan, Governmental Relations Committee, REACT International

Mr. Richard Pratz, Field Director, REACT International

Mr. Ron McCracken, President, REACT International